

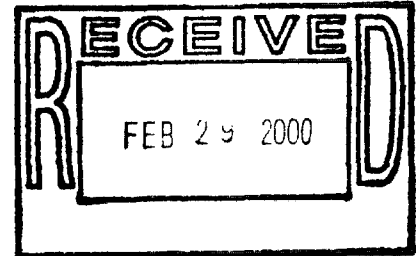


NATURE'S SUNSHINE PRODUCTS INC.

75 E. 1700 S. • P.O. BOX 19005 PROVO, UTAH 84605-9005
TEL: (801) 342-4300 • FAX: (801) 342-4305

February 23, 2000

Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
U. S. FOOD AND DRUG ADMINISTRATION
200 C. Street S. W.
Washington, DC 20204



RE: Notification for Statements on Dietary Supplement Labels

Ladies and Gentlemen:

This notification is being submitted on behalf of Nature's Sunshine Products, Inc., of Provo, Utah, a manufacturer and distributor of dietary supplement products (hereafter "Nature's Sunshine").

Pursuant to the requirements of Section 6 of the Dietary Supplement Health and Education Act of 1994, 21 U. S. C. §343 (r)(6), and in accordance with the authorized provisions of 21 CFR §101.93(a), your agency is hereby notified that Nature's Sunshine has made statements of "nutritional support," as described in 21 U. S. C. §343(r)(6)(A), for its dietary supplements as follows:

1. Echinacea – Immune System Support, Echinacea Purpurea helps support the immune system during the changing seasons.
2. Proactazyme – Digestive System Support, Supports Proper Digestion, Vegetarian Formula, Helps Break Down Difficult-to-Digest-Food. A full-spectrum product, aids digestion of all foods and is scientifically balanced for maximum effectiveness. Proactazyme is protected with an exclusive herbal blend to: Relax and soothe the stomach, activate the enzymes, buffer and stabilize the enzymes from stomach acids.
3. Women's DHEA-F – Glandular, Immune, and Nervous System Support. DHEA-F was developed to provide daily benefits for women pursuing a healthier lifestyle. DHEA (dehydroepiandrosterone) a naturally-occurring steroid nutrient produced in the adrenal (cortex) gland, is converted to important and essential hormones in the body, ensuring good health; natural production declines with age. DHEA-F, with beneficial herbs, supplements your body's naturally produced DHEA.

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4. Korean Ginseng – Glandular System Support. Korean Ginseng is best known for its adaptogenic properties.

5. Wild American Ginseng – Glandular System Support. This adaptogenic, revitalizing, tonic herb helps the body cope with change and life's stresses

6. Food Enzymes – One capsule digests at least 30g Protein, 30g Carbohydrates, 20g Fats, Helps supply Enzymes Lacking in Diet, Improved Digestion for Maximum Nutrition.

7. Metabomax – a Natural, Herbal Formula to help with weight loss, increased energy, and maintenance. Thermogenesis, increasing metabolic fat burn, results in weight loss, fat loss, and inches loss. Metabolic Maximizer to Enhance Weight Loss and Energy.

8. Fen-Chi – Burns Fat with Increased Metabolism, Phytonutrients Nourish the Body, Very Successful in Combination with Fat Grabbers.

9. Digestive Bitters Tonic – Enhances Secretion of Digestive Juices, Improves Absorption of Nutrients, Stimulates and Cleanses the Liver and Gall Bladder. Digestive Bitters Tonic strengthens the digestive system. Anyone who wants to improve appetite and nutritional absorption would find Digestive Bitters Tonic invigorating to the digestive system. The bitters prime the secretion of digestive juices by stimulating the bitter taste receptors on the tongue. This action stimulates appetite and improves digestive system function.

10. Brain-Protex with Huperzine A – Improves Brain Function, Memory & Alertness, Protects Brain Capacity, Improves & Protects Nerves, Bioavailable: Rapidly Passes Blood-Brain Barrier. Brain Protex w/ Huperzine is specially formulated to contain protective herbs, phospholipids, and antioxidants proven beneficial to the brain. Powerful antioxidants pass through the blood-brain barrier to neutralize free radicals before they can damage brain cells. Increased blood flow, powerful nutrients and antioxidants “feed and protect” the brain, enhancing memory and supporting brain activity.

11. CA – Structural System Support

12. Echinacea/Golden Seal – Immune System Support, Promotes Optimal Function of the Immune System during Seasonal Changes, Helps Detoxify Body and Strengthen Immune Response. Helps support the Immune System during seasonal changes.

13. Four – Nervous and Respiratory System Support, Supports Respiratory System, Encourages Free-Breathing.

14. Ginkgo Biloba Extract – Nervous and Circulatory System Support. Ginkgo Biloba promotes optimal blood circulation to the brain and supports memory and concentration functions.

15. Guggul Lipid – Circulatory System Support.

16. Garcinia Combination – Glandular System Support for Weight Management, Suppress Appetite, Increases Energy. Many exciting studies using Garcinia have produced very encouraging results in the area of weight management.

17. Cellu-Smooth – Mobilizes Fat Stores, Increases General Circulation, Protects against Free-Radical Damage to Structural Skin Proteins. Cellu-Smooth is specially formulated to reduce absorption of dietary fats, to enhance fatty acid metabolism and mobilization in stored fat, and to provide protection against free-radical damage of structural skin proteins.

18. Olive Leaf Extract – Immune and Circulatory System Support. Olive Leaf Extract is a natural way to support each of these systems. It specifically enhances the Immune System with its powerful neutralizing constituents, without harming beneficial bacteria.

19. Green Tea – Immune and Circulatory System Support, Potent Antioxidant – Immune Booster, Three Capsules Equals 10 Cups of Liquid Green Tea, Supports Healthy Kidney Function.

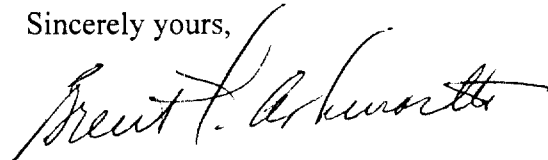
20. Pyruvate 800 – Promote Weight Loss, Enhance Fat Loss. This unique, natural blend of ingredients offers a powerful, natural alternative designed to help maintain muscle tissue during weight loss.

21. Pau D'Arco – Immune System Support, Strengthens Immune System, Helps Build Blood & Maintain a Healthy Circulatory System, Assists Detoxification Process.

22. Liquid Morinda Citrifolia Fruit - Structural, Immune, and Digestive System Support, Richer Smoother Taste, Antioxidant Protection, Supports Joint Health. Historically, the fruit was used to target many systems, especially the Immune and Structural Systems. It is particularly useful for promoting healthy skin and joints, creating a general feeling of well being.

The undersigned hereby certifies on behalf of Nature's Sunshine that the information presented and contained in this correspondence is complete and accurate.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Brent F. Ashworth". The signature is fluid and cursive, with a large initial "B" and "A".

Brent F. Ashworth
Vice President - Legal Affairs

bfa: jmw

cc: Bob Armstrong, Blake Christensen, Debbie Claitor